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10 *Attorneys for NewRez LLC dba Shellpoint Mortgage Servicing*

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13 UNITED STATES DISTRICT COURT
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15 DISTRICT OF NEVADA

16 NEWREZ LLC DBA SHELLPOINT
17 MORTGAGE SERVICING,

18 Case No.: 2:20-cv-00946-JCM-BNW

19 Plaintiff,

20 vs.

21 JOEL A. STOKES AND SANDRA F. STOKES,
22 as trustees of the JIMIJACK IRREVOCABLE
23 TRUST; DOE INDIVIDUALS I-X, inclusive,
24 and ROE CORPORATIONS I-X, inclusive,

25 Defendants.

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28 **STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
DEADLINE**

(THIRD REQUEST)

29 Plaintiff NewRez LLC dba Shellpoint Mortgage Servicing (**Shellpoint**) and defendants Joel A.
30 Stokes and Sandra F. Stokes, as Trustees of the Jimijack Irrevocable Trust (**the Trust**), by and
31 through their attorneys of record, file this stipulation to extend the deadline to file dispositive motions
32 by fourteen days (14) days, or until **April 11, 2022**. In support of this stipulation, the parties state as
33 follows:

34 1. On August 17, 2021, the Court issued a minute order granting Shellpoint's motion to
35 compel as to non-party Keynote Properties, LLC. (ECF No. 33). The minute order extended
36 discovery through October 1, 2021 and stayed the dispositive deadline.

1 2. On September 3, 2021, the parties filed a joint status report regarding the completion of
2 remaining discovery. (ECF No. 34). Shellpoint requested the Court further extend the discovery
3 deadline to December 15, 2021.

4 3. On September 7, 2021, the Court issued a second minute order granting Shellpoint's
5 request and extending discovery through December 15, 2021. (ECF No. 35). The Court further
6 directed Shellpoint to file a follow-up status report, which Shellpoint timely filed on October 15,
7 2021. (ECF No 36).

8 4. On January 14, 2022, the parties filed a stipulation to lift the stay and reset the
9 dispositive deadline. (ECF No. 37). The stipulation requested the Court reset the dispositive deadline
10 for February 11, 2022.

11 5. On January 18, 2022, the Court granted the parties' stipulation and set the dispositive
12 deadline for February 11, 2022. (ECF No. 38).

13 6. Since this time, the parties have engaged in settlement discussions to gauge the
14 potential for resolution. The parties submitted a stipulation extending the dispositive deadline by two
15 weeks on February 10, 2022, and thirty days on February 24, 2022. (ECF Nos. 39, 41). The court
16 granted the stipulations, setting the current dispositive deadline as March 28, 2022. (ECF No. 42).

17 7. The parties continue to engage in settlement discussions to see if a potential resolution
18 is possible. Due to some unforeseen delays, this process has taken longer than previously expected.
19 The parties therefore agree to an additional fourteen (14) day extension to the dispositive deadline to
20 allow the parties to continue discussions.

21 8. The parties believe this extension serves both the interests of the parties and judicial
22 economy, as it would allow the parties to continue exploring whether resolution is possible before
23 incurring additional expenses on dispositive briefing. The parties do not anticipate requesting further
24 extensions to this deadline.

25 9. Based on the foregoing, the parties submit good cause supports the requested extension
26 to April 11, 2022, and respectfully request the court grant the same.

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